

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MARK SULLIVAN,	:	
Plaintiff,	:	CASE NO. 2:23-CV-03174
v.	:	JUDGE MICHAEL H. WATSON
THE OHIO STATE UNIVERSITY, <i>et al.</i>	:	MAGISTRATE JUDGE
Defendant.	:	KIMBERLY A. JOLSON

JOINT STATUS REPORT

Pursuant to the Court’s October 21, 2024 Order, the above parties, by and through their respective undersigned counsel, hereby submit this Joint Status Report.

On August 5, 2024, Defendants filed a Motion to Dismiss (“Motion”) Plaintiff’s Third Amended Complaint. (ECF No. 53). Defendants’ Motion is currently pending before the Court. The parties have exchanged written discovery. On October 1, 2024, Plaintiff issued written discovery requests to Defendants. Defendants are in the process of finalizing their responses to Plaintiff’s written discovery requests. On October 9, 2024, Defendants issued written discovery requests to Plaintiff. Plaintiff submitted responses to Defendants’ written discovery on November 25, 2024.

The parties are in the process of gathering relevant information, including emails from OSU staff. In this regard, the parties have conferred regarding search parameters for emails and have finalized mutually agreed upon parameters so that OSU can begin collecting and reviewing emails.

The parties have not discussed settlement. The parties remain available for a telephone status conference should the Court need any additional information.

Respectfully submitted,

DAVE YOST (0056290)
Ohio Attorney General

*s/ Daniel P. Petrov (per email consent
dated December 2, 2024)*

s/ In Son J. Loving

DANIEL P. PETROV (0074151)
SARA E. WYSS (0100278)
THORMAN PETROV GROUP CO., LPA
20046 Walker Avenue
Shaker Heights, Ohio 44122
(216) 621-3500 – Telephone
(216) 621-3422 – Facsimile
dpetrov@tpgfirm.com
swyss@tpgfirm.com

Counsel for Plaintiff Mark Sullivan

IN SON J. LOVING (0084848)
Trial Counsel
Senior Assistant Attorney General
DAVID B. STOUFFER (0093972)
Associate Assistant Attorney General
Employment Law Section
615 W. Superior Ave., 11th Floor
Cleveland, Ohio 44113
(614) 644-7257 – Telephone
(614) 752-4677 – Facsimile
ELSReview@OhioAGO.gov

WENDY K. CLARY (0077775)
Principal Assistant Attorney General
Employment Law Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215
(614) 644-7257 – Telephone
(614) 752-4677 – Facsimile
ELSReview@OhioAGO.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

This will certify that the foregoing *Joint Status Report* was filed electronically on December 3, 2024. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ In Son J. Loving

IN SON J. LOVING (0084848)

Trial Counsel

Senior Assistant Attorney General